

Exhibit 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS,
EASTERN DIVISION**

Protect Our Parks, Inc.; Charlotte Adelman;)	
Maria Valencia and Jeremiah Jurevis;)	No. 18-cv-03424
Plaintiffs,)	
v.)	Honorable John Robert Blakey
)	
Chicago Park District and City of Chicago,)	Jury Demanded
Defendants.)	

PLAINTIFFS' FIRST REQUEST TO PRODUCE TO CITY OF CHICAGO

Now come the Plaintiffs, Protect Our Parks, Inc.; Charlotte Adelman; Maria Valencia and Jeremiah Jurevis, through their undersigned attorneys, and pursuant to Rule 34 of the Federal Rules of Civil Procedure request that the Defendant, City of Chicago, produce the following documents, electronically stored information and tangible things at the law offices of Roth Fioretti, CCL 311 S. Wacker Drive, Suite 2470, Chicago Illinois within 30 days from service of this Request to Produce.

DEFINITIONS

For purposes of this Request to Produce, the following definitions shall apply unless otherwise specifically indicated:

1. The word "document" shall mean any written or graphic matter or other means of preserving thought or expression, and all tangible things from which information can be processed or transcribed, including, but not limited to, correspondence, memoranda, notes, messages, letters, electronic mail (emails), facsimiles, telegrams, teletyped messages, bulletins, diaries, chronological data, minutes, books, reports, charts, ledgers, invoices, worksheets, receipts, computer printouts, schedules, affidavits, contracts, transcripts, surveys, graphic representations of any kind, photographs, graphs, microfilm, video tapes, tape recordings, motion pictures or other film and all electronically stored information.

2. "Person" means any natural person or any legal entity, including, but not limited to, a corporation, partnership and unincorporated association, and any officer, director, employee, agent or other person acting or purporting to act on its behalf.

3. "And" and "or" shall be construed disjunctively or conjunctively as necessary in order to bring within the scope of each request all documents which might otherwise be construed to be outside its scope.

4. "Each" includes both "each" and "every."
5. The singular and masculine gender shall, respectively, include the plural and feminine gender, and vice versa.
6. "Relating to," "relates to," and "regarding" mean, without limitation, relating to, concerning, constituting, mentioning, referring to, describing, summarizing, evidencing, listing, relevant to, demonstrating, tending to prove or disprove, or explain.
7. "Communication" or "communications" includes, without limitation, in-person or telephone conversations, facsimiles, letters, electronic mail (email), telegrams, telexes, text messages, tapes or other sound recordings, or other means of transmitting information from one source to another.
8. "Foundation" shall mean the Obama Foundation, and all other persons acting or purporting to act on behalf of the Obama Foundation.
9. "City of Chicago" shall mean the City of Chicago, a municipal corporation, and shall include City departments, including but not limited to the Department of Planning and Development, the Chicago Department of Transportation and the Office of the Mayor and all other persons acting or purporting to act on behalf of the City.
10. "Chicago Park District" shall mean the Chicago Park District, and all other persons acting or purporting to act on behalf of the Chicago Park District.
11. "OPC" shall mean a presidential center proposed by the Foundation.
12. "OPC Site" shall mean the site for the Obama Presidential Center as defined in the 2018 Ordinance.
13. "UofC" shall mean the University of Chicago.
14. "UIC" shall mean the University of Illinois at Chicago.
15. "RFP" shall mean the Foundation's Request for Proposal issued on or about September 15, 2014 related to the OPC.
16. "Bid Package" shall mean any proposal submitted by the University of Chicago or the University of Illinois at Chicago in response to the RFP.
17. "UPARR" shall mean the Urban Park and Recreation Recovery Act.
18. "2015 Ordinance" shall mean the City of Chicago Ordinance attached to Plaintiff's Complaint as Exhibit A.
19. "2018 Ordinance" shall mean the proposed Ordinance attached hereto as Exhibit B.

20. “Environmental Agreement” means the Environmental Remediation and Indemnity Agreement attached as Exhibit F to the 2018 Ordinance.
21. “Washington Park Site” shall mean the location in the northwest portion of Washington Park proposed by the University of Chicago as a potential site for the OPC, as identified in the City’s January 2015 Ordinance.
22. “South Shore Cultural Center Site” shall mean the location described as “a location near the South Shore Cultural Center in Jackson Park in the City’s January 2015 Ordinance.
23. “Museum Act” means the Illinois Park District Aquarium and Museum Act, 70 ILCS 1290/0.01 *et seq.*
24. “Amendment to Museum Act” means the amendments to the Museum Act enacted in the year 2016, and referenced in Plaintiff’s Complaint.
25. “NPS” means National Park Service.
26. “FHA” means the Federal Highway Administration.
27. “SHPO” means the Illinois Historic Preservation Office.

REQUEST FOR PRODUCTION

Produce all of the following documents and tangible things in your possession, custody or control related to:

1. Any financial and/or economic analysis relating to locating the OPC at any site in Chicago.
2. Any and all documents related to any analysis related to costs and expenses to the public regarding locating the OPC on the OPC Site.
3. Any and all documents related to any analysis discussing the public or private benefits to any private person or entity, regarding locating the OPC on the OPC Site.
4. Any and all documents related to any analysis of benefits to the Foundation as a result of locating the OPC at the OPC Site.
5. Any and all documents related to any analysis of benefits to the Foundation as a result of locating the OPC at any location in Chicago other than the OPC Site.
6. Any and all documents related to any analysis related to costs and expenses to the public regarding locating the OPC on the Washington Park Site.
7. Any and all documents related to any analysis, including but not limited to public or private benefits to any private person or entity, regarding locating the OPC on the Washington Park Site.
8. Any and all documents related to any analysis related to costs and expenses to the public regarding locating the OPC on the South Shore Cultural Center Site.

9. Any and all documents related to any analysis, including but not limited to public or private benefits, regarding locating the OPC on the South Shore Cultural Center Site
10. Any and all documents related to any analysis related to costs and expenses to the public regarding locating the OPC on a site in Chicago other than those referenced in Requests 2 to 9 inclusive.
11. Any and all documents related to any analysis, including but not limited to public or private benefits to any private person or entity, regarding locating the OPC on a site in Chicago other than those referenced in Requests 2-9.
12. Any and all documents related to the change of boundaries of the OPC Site from the original location proposed in the 2015 Ordinance to the OPC Site.
13. Any and all documents related to related to the fair market value of the OPC Site.
14. Any and all covenants, restrictions, deeds, liens, encumbrances and grants related to Jackson Park at any time to the present.
15. Any and all covenants, restrictions, deeds, liens, encumbrances and grants recorded on title to the OPC Site.
16. Any and all title commitments or title reports related to the OPC Site.
17. Any and all documents related to the cost to the State of Illinois as a result of locating the OPC at the OPC Site.
18. Any and all documents related to the reason why the Presidential Center will not include a "Presidential Library," as defined in The Presidential Library Act of 1955.
19. Any and all documents related to the OPC's compliance with the Museum Act.
20. Any and all documents related to drafts of the Amendment to the Museum Act.
21. Any and all documents related to lobbying related to amending the terms of the Museum Act.
22. Any and all documents related to communications regarding the Amendment to the Museum Act.
23. Any and all documents, including communications, to or from the Foundation related to the Museum Act.
24. Any and all documents, including communications, to or from the UofC related to the Museum Act
25. Any and all documents related to the City's involvement with the Amendment to the Museum Act.
26. Any and all documents related to the 2016 to the Amendment to the Museum's Act's declaration that "The changes made to this Section by this amendatory Act of the 99th General Assembly are declaratory of existing law and shall not be construed as a new enactment."
27. Any and all documents related to any analysis or study related to environmental or other remediation necessary to accommodate the OPC on the OPC Site.
28. Any and all documents related to the City's incremental costs of remediating the OPC Site as referenced in the Environmental Agreement.

29. Any and all documents related to soil tests related to the OPC Site from January 2014 to the present.
30. Any and all documents related to soil tests related to the Washington Park Site from January 2014 to the present.
31. Any and all documents related to the Foundation's concerns regarding the City's lack of control over proposed park sites, as referenced on page 2 of the 2015 Ordinance.
32. Any and all documents related to real property designated as a replacement parkland as a result of locating any buildings on the OPC Site.
33. Any and all documents related to real property designated as a replacement open space property as a result of locating any buildings on the OPC Site.
34. Any and all documents related to the UPARR grant agreement from 1980 in the amount of \$125,200, as referenced on page 9 of the 2018 Ordinance.
35. Any and all documents related to the UPARR grant agreement from 1981 in the amount of \$135,870. As reference on page 9 of the 2018 Ordinance.
36. Any and all documents related to any other UPARR grant agreements regarding land in Jackson Park, other than those referenced in Requests 2 and 3, above.
37. Any and all documents related to the City requesting that the NPS approve amendments to the UPARR grant agreements to remove the grant conditions from the footprint of the Museum, Library and Forum Buildings on the OPC Site, and to transfer those conditions to another location, as stated in the 2018 Ordinance.
38. Any and all documents related to any locations considered by the City and/or the Foundation (whether in Jackson Park or outside of Jackson Park) as replacement property to comply with UPARR.
39. Any and all documents related to reviews by the NPS related to the OPC Site.
40. Any and all documents related to reviews by the FHA related to the OPC Site.
41. Any and all documents related to roadway closures as a result of locating the OPC at the OPC Site, including but not limited to the economic impact and the impact on traffic.
42. Any and all documents related to roadway closures as a result of locating the OPC at any location in Chicago, other than the OPC Site, including but not limited to the economic impact and the impact on traffic.
43. Any and all documents related to the Foundation paying real estate taxes related to the Obama Center.
44. Any and all documents related to the fair market value of the land to be dedicated for use of the OPC Site.
45. Any and all documents related to the Department of Homeland Security providing security for the OPC.
46. Any and all documents related to the reason why the 2018 Ordinance proposed a "Use Agreement," as opposed to a lease referenced in the 2015 Ordinance.
47. Any and all documents related to the RFP.
48. Any and all documents related to the UofC's responses to the RFP.

49. Any and all documents related to the UIC's response to the RFP.
50. Any and all Bid Packages.
51. All documents, including but not limited to communications, between the City and the Foundation regarding the OPC.
52. All documents, including but not limited to communications, between the City and the UofC regarding the OPC.
53. All documents, including but not limited to communications, between the City and the Park District regarding the OPC.

Respectfully submitted,

/s/ Mark D. Roth

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PROOF OF SERVICE

I, Mark Roth, an attorney, certify that I served the **Plaintiffs' First Request To Produce to the City of Chicago** by email transmission from mark@rothfioretti.com to the following persons at their email addresses shown below on or before 5:00 pm. on October 23, 2018.

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